

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1962 & 2110

**CERTIFICATION OF COUNSEL REGARDING SUPPLEMENTAL ORDER (I)
SETTING A BAR DATE FOR FILING PROOFS OF CLAIMS FOR PRE-CLOSING
ADMINISTRATIVE EXPENSE CLAIMS AGAINST DEBTORS, (II) ESTABLISHING
PRE-CLOSING ADMINISTRATIVE EXPENSE CLAIM PROCEDURES, AND (III)
GRANTING RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On February 7, 2025, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 1962] (the “**Procedures Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).² Attached as Exhibit A to the Procedures Motion was a proposed form of order

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms not defined herein have the meanings ascribed to them in the Procedures Motion.

granting the relief requested therein (the “**Proposed Order**”). The Proposed Order stated that Exhibit 4 to the Proposed Order was the Pre-Closing Administrative Expense Claims Schedule.

2. After a hearing on the matter on February 26, 2025, the Debtors filed the *Certification of Counsel Regarding Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2102]. The Debtors omitted Exhibit 4, the Pre-Closing Administrative Expense Claims Schedule, from the submitted form of order.

3. On February 27, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2110] (the “**Order**”). The Order did not include Exhibit 4.

4. The Debtors have supplemented the Order to include the updated Pre-Closing Administrative Expense Claims Schedule (the “**Supplemental Order**”) as Exhibit 4 and the service versions of the Pre-Closing Administrative Expense Claims Notices as Exhibits 2 and 3.

5. No other changes have been made to the Order.

WHEREFORE, the parties respectfully request that this Court enter the Supplemental Order, substantially in the form attached as Exhibit 1 hereto, which includes the Pre-Closing Administrative Expense Claims Schedule as Exhibit 4.

[Signature page follows]

Dated: March 5, 2025
Wilmington, Delaware

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